

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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November 8, 2024

**BY ECF**

Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

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**Re: United States v. Luis Bonilla  
24 CR 35 (MKV)**

Dear Judge Vyskocil:

I write on behalf of all parties to provide a status update in this matter, which is currently scheduled for a conference on November 14, 2024.

As the Court is aware, this matter is a Violation of Supervised Release that tracks allegations that are being litigated in state court. The state court case remains pending and is currently scheduled for trial on November 12, 2024.<sup>1</sup> Based on my conversations with Mr. Bonilla's state defense attorney, I understand there is unlikely to be a trial that day, as the state's witnesses have expressed an interest not to proceed with the case. The state attorney expects that the matter will be adjourned to determine whether it will be dismissed pursuant to N.Y.C.P.L. § 30.30 (New York state's speedy trial statute).

In light of this, the parties respectfully request that the Court adjourn this matter to January 2025 (after January 7, given defense counsel's availability) to await resolution of the state matter.

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<sup>1</sup> I understand from Mr. Bonilla's state defense attorney that this appearance will be administratively adjourned to November 19, 2024.

Respectfully submitted,

/s/ Hannah McCrea

Hannah McCrea


Assistant Federal Defender

(212) 417-8724

cc: AUSA Benjamin Burkett

The parties must file a status letter by 12:00 p.m. tomorrow, November 13, 2024, informing the Court of what occurred in the state court proceedings on November 12, 2024.

Date: Nov. 12, 2024  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge